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Philips Electronics North America Corporation*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

This Document Relates to:

*Sears, Roebuck and Co. and Kmart Corp. v.  
Technicolor SA*, No. 3:13-cv-05262;

*Sears, Roebuck and Co. and Kmart Corp. v.  
Chunghwa Picture Tubes, Ltd.*, No. 11-cv-  
05514;

*Sharp Electronics Corp., et al. v. Hitachi, Ltd.,  
et al.*, No. 13-cv-01173;

*Sharp Electronics Corp. v. Koninklijke Philips  
Elecs., N.V.*, No. 13-cv-2776 SC;

Case No. 07-5944 SC

MDL No. 1917

**DECLARATION OF TIFFANY B.  
GELOTT IN SUPPORT OF JOINT  
DEFENSE REPLY IN SUPPORT OF  
MOTION IN LIMINE #10: MOTION TO  
EXCLUDE EVIDENCE OF ANY  
ALLEGED CDT PRICE-FIXING  
CONSPIRACY**

Date: None set  
Time: 10:00 a.m.  
Place: Courtroom No. 1

Hon. Samuel Conti

1 *Target Corp. v. Chunghwa Picture Tubes, Ltd.*,  
2 No. 11-cv-05514;

3 *Target Corp. v. Technicolor SA*, No. 13-cv-  
4 05686.

1 I, Tiffany B. Gelott, hereby declare as follows:

2 1. I am an associate with the law firm of Baker Botts L.L.P., counsel for Defendants  
3 Koninklijke Philips N.V. and Philips Electronics North America Corporation (collectively, the  
4 “Philips Defendants”). I am a member of the bar of the District of Columbia and I am admitted to  
5 practice before this Court *pro hac vice*. I submit this declaration in support of the Joint Defense  
6 Reply in Support of the Motion in Limine #10: Motion to Exclude Evidence of Any Alleged CDT  
7 Price-Fixing Conspiracy (the “Reply”). The information contained herein is based on my own  
8 personal knowledge, and if called as a witness I could, and would, testify competently that the  
9 matters set forth herein are true.

10 2. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Report of  
11 Alan S. Frankel, dated April 15, 2014, regarding Sears and Kmart;

12 3. Attached hereto as Exhibit 2 is a true and correct copy of the Expert Report of  
13 Alan S. Frankel, dated April 15, 2014, regarding Target;

14 4. Attached hereto as Exhibit 3 is an excerpt from a true and correct copy of  
15 interrogatory responses from Sharp Electronics Corporation and Sharp Electronics Manufacturing  
16 Company of America, Inc.’s First Supplemental Responses and Objections to Defendants Hitachi  
17 Electronic Devices (USA), Inc. and Samsung SDI America, Inc.’s First Set of Interrogatories,  
18 dated February 26, 2014 (“Sharp’s Interrogatory Responses”).

19 5. Attached hereto as Exhibit 4 is an excerpt from the Deposition of Jerry Hausman,  
20 dated July 23, 2014.

21 6. Attached hereto as Exhibit 5 is an excerpt from a true and correct copy of the  
22 Expert Report of Jerry Hausman, dated April 15, 2014.

23 7. Attached hereto as Exhibit 6 is a true and correct copy of SDI Amended Plea  
24 Agreement (Case No. 3:11-cr-00162-WHA, ECF No. 26-2), dated May 12, 2011.

25 8. Attached hereto as Exhibit 7 is a true and correct copy of a certified translation of  
26 a document produced by the Chunghwa Defendants with the bates number, CHU00028521E.

27 9. Attached hereto as Exhibit 8 is a true and correct copy of a certified translation of  
28 a document produced by the Chunghwa Defendants with the bates number, CHU00028558E.

